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March 11, 2021

BY ECF

Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street, Room 24A
New York, New York 10007

Re: Marina Brown v. New York City, et al.
Civil Action No.: 20-cv-10948 (CM)

Dear Judge McMahon:

I am the Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, assigned to represent defendants City of New York ("City") and the New York City Department of Education ("DOE") (collectively, "Defendants") in the above-referenced action. I write, with the consent of Plaintiff's counsel, to respectfully request a three-week extension of time, from March 15, 2021 to April 5, 2021, for Defendants to respond to the complaint. Defendants previously requested, and the Court granted, an extension of time from January 28, 2021 to March 15, 2021 for Defendants to respond to the Complaint. There are no other dates previously scheduled after the original date.

This additional extension request is made due to the undersigned's very heavy caseload which, with recent intervening obligations and unanticipated matters, including multiple motions to dismiss and for summary judgment, and preparation for several upcoming depositions, necessitates additional time to prepare and finalize Defendants' response to the Complaint.

cc: Ethan Leonard, Esq. (by ECF)
The Law Offices of Neal Brickman, PC
Attorneys for Plaintiff

Thank you for your consideration of this matter.

Respectfully Submitted,

/s/

Laura C. Williams
Assistant Corporation Counsel
